

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON/GREENWOOD DIVISIONS**

Adlife Marketing & Communications  
Company, Inc.

Plaintiff,

vs.

Quality Foods of Anderson, S.C., Inc.,

Defendant.

C.A. No.: 8:18-cv-01976-TMC

Quality Foods of Anderson, S.C., Inc.,

Third-Party Plaintiff,

vs.

Gannett Company, Inc., d/b/a Anderson  
Independent Mail, and Mainstreet  
Newspapers, Inc., d/b/a Main Street News,

Third-Party Defendants.

**THIRD-PARTY DEFENDANT  
GANNETT CO., INC.'S ANSWERS TO  
LOCAL RULE 26.01  
INTERROGATORIES**

Third-Party Defendant Gannett Co., Inc.<sup>1</sup> (“Gannett”) hereby responds to Local Rule 26.01 Interrogatories as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

**RESPONSE: Gannett is not aware of any such person or entity at this time.**

B. As to each claim, state whether it should be tried jury or nonjury and why.

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<sup>1</sup> Gannett has been erroneously sued herein as “Gannett Company, Inc., d/b/a Anderson Independent Mail.” The corporate entity which operates the Anderson Independent Mail is Scripps NP Operating, LLC.

**RESPONSE: Gannett requests a jury trial, as the claims assert causes of action at law as to which there are issues of fact, and to which Gannett is entitled to a jury trial.**

C. State whether the party submitting these responses is a publicly-owned company and separately identify, (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**RESPONSE: Gannett is a publicly traded company. It has no parent corporation and none of Gannett's subsidiaries is publicly traded. Black Rock, Inc., a publicly traded company, owns ten percent or more of Gannett's stock. Gannett does not own ten percent or more of any publicly traded company.**

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01 (D.S.C.).

**RESPONSE: Plaintiff filed the underlying action in this division, and defendant brought Gannett in via a third-party complaint. Gannett does not challenge the appropriateness of this division.**

E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide, (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE: None known.**

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**RESPONSE: Gannett has been erroneously sued herein as “Gannett Company, Inc., d/b/a Anderson Independent Mail.” The corporate entity which operates the Anderson Independent Mail is Scripps NP Operating, LLC. Counsel will accept service of an amended summons and pleading reflecting the correct identification.**

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**RESPONSE: None known at this time.**

Respectfully submitted,

WYCHE, P.A.

s/ Wallace K. Lightsey

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**ATTORNEYS FOR THIRD-PARTY DEFENDANT  
GANNETT CO., INC.**

Date: November 19, 2018